**To:** Rea, Kristi[Rea.Kristi@epa.gov]
**Cc:** Leiby, Anne[Leiby.Anne@epa.gov]; Secunda, Joshua[secunda.josh@epa.gov]; Civian, Frederick (DEP)[frederick.civian@state.ma.us]
**From:** King, Susannah (DEP)
**Sent:** Fri 6/16/2017 3:41:14 PM
**Subject:** Re: Draft Stormwater News Issue
SW news draft DEP edits 06-16.docx

Hi Kristi and Anne-


Thank you for the opportunity to review the NOI-themed next edition of SW News. The Q&A format – combined with EPA's webinars and the upcoming EPA-DEP trainings – will make it much easier for the  regulated community to fill out that NOI.


Fred and I have reviewed the draft and we have two general comments:

1.   We think that the draft needs some  significant revisions to focus on the specific questions that Towns are currently asking.  Taking the time to do that work now will be more useful to the Towns than the more general background information that the piece currently contains. Deleting more general questions to make room for more specific questions will keep us within space limits.

2.    Answers should be briefer and more targeted. For example, the answer to the question about whether approvals are needed from FWS and SHPO/TPHO should say "no" and include the direction that EPA is already providing in its NOI training: in some cases informal consultation will be needed.


Here are some specific comments to start the rewrite process (additional comments in track changes in the document):

•     Delete the general question about the purpose of the NOI (alternatively, it could be shortened to one sentence (see edits in document))

•     Delete the general question about the purpose of endangered species and historic resources

•     Move the "How detailed does the completed NOI have to be " question as close to the beginning of the Q&A section as possible. That is the question Fred gets asked the most. Many Towns believe that the NOI is the legally binding document that demonstrates their permit compliance (it's not: the SWMP is) and that they need to do significant additional work now in order to complete the NOI (e.g., complete their outfall inventory prior to Sept 29, 2017)

•     After the "How detailed does the NOI. . ." question add this question: "Am I required to do additional stormwater system work before I fill in the NOI?"

EPA-HQ-2017-009009                          Prod 2                          ED_001444D_00000112-00001

- After the "Do I need approval from FWS . . ." question, add these two questions:

o How does "informal consultation" work?

o The only endangered species I am finding is the long-eared bat; what do I need to do?

- Add a question: How do I find a list of impaired waters and completed TMDLs for my Town?

We appreciate all the work EPA has already put into this and realize that this additional work will affect the schedule, but we think these rewrites will make the SW News much more useful to the Towns. We do not intend to share this version with our upper management for their review, as we think it would be more efficient to wait until the revised version is available. Fred is available to help with any initial drafting or editing work you need - he has a very good sense of what the Towns are asking, so I definitely encourage you to pick his brain.

Please let us know if you have any questions.

Thanks,

Susy

_____

Susannah L. King
NPDES Section Chief
MassDEP
1 Winter Street
Boston, MA 02108
617-556-1147
susannah.king@state.ma.us

_____

**From:** Rea, Kristi <Rea.Kristi@epa.gov>
**Sent:** Monday, June 12, 2017 8:53 AM
**To:** King, Susannah (DEP); Civian, Frederick (DEP)
**Cc:** Leiby, Anne; Secunda, Joshua
**Subject:** Draft Stormwater News Issue

Good morning! Apologies that I did not get this to you Friday as planned – it was my fault, not the team's. I was at a meeting all day and it honestly slipped my mind until this morning! Special thanks to the team for pulling this great draft together and we look forward to your edits and feedback. As you'll see – this is just "text" and we have a few placeholders where we're still figuring out some dates for upcoming trainings so we'll

keep you updated as we finalize those.  Thanks and look forward to seeing you later this morning!


Take care,

Kristi